

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MARYLAND

IN RE:

\*

SETH AND BESSY BLUM

\* CASE NO: 25-10005

DEBTOR

\* CHAPTER 11

\*\*\*\*\*

CREDITOR PETER ELMO'S  
OBJECTIONS TO CONFIRMATION OF DEBTORS' PROPOSED CHAPTER 11 PLAN

Now comes Creditor Peter Elmo, by his attorney Richard J. Hackerman, and files the following objections to the confirmation of the Debtors' proposed Chapter 11 Plan.

1. The plan filed by the Debtors was not proposed in good faith.
2. The Debtors are not devoting all of their disposable income to the plan.
3. Debtor Seth Blum is paying \$2,133.32 into a "voluntary retirement plan". Creditors should not be funding the Debtors' retirement.
4. The Debtors are purportedly paying \$1,600.00 per month for child care/education. Creditors should not be funding the Debtors' private school education for their children.
5. The Debtors list \$800.00 per month in entertainment expenses. Creditors should not be funding anything close to that amount, particularly the Debtors' country club life style.
6. The Debtors list a \$1,238.57 vehicle payment for one vehicle. Creditors should not be funding the Debtors' high brow transportation tastes.
7. The Debtors list \$350.00 per month for charitable and religious donations. If that is true, Creditors should not be funding the Debtors' donations, particularly to that extent.
8. The Debtors' homeowner association/condominium payments of \$700.00 pe month appear implausible. If the Debtors are referring to their investment properties, this expense will soon be in large part gone given they intend to sell at least some of these properties.
9. The Debtors listed expenses as a whole appear inflated.

10. The Debtors can afford to make a larger payment for a longer period of time than as proposed in their plan.

11. The Debtors have failed to account for rents received for their investment properties which are primarily summer rentals.

/s/ Richard J. Hackerman

---

Richard J. Hackerman  
3635 Old Court Road, Suite 208  
Baltimore, Maryland 21208  
(410) 243-8800  
(410) 630 7232 (fax)  
Attorney for Creditor Peter Elmo  
CPF 8212010181  
[Richard@richardhackerman.com](mailto:Richard@richardhackerman.com)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 2, 2025 a copy of the foregoing Notice of Appearance were mailed by first class mail, postage prepaid to the following:

Daniel M. Press, Esquire  
Chung & Press, P.C.  
6718 Whittier Ave., Ste. 200  
McLean, VA 22101

Trustee  
Monique Desiree Almy  
Cowell & Moring  
1001 Pennsylvania Avenue, N.W., 10th Fl  
Washington, DC 20004-2595

U.S. Trustee  
Hugh M. Bernstein  
Office of U.S. Trustee  
101 W. Lombard Street  
Suite 2625  
Baltimore, MD 21201

All creditors on the attached mailing matrix.

/s/ Richard J. Hackerman

---

Richard J. Hackerman  
3635 Old Court Road, Suite 208  
Baltimore, Maryland 21208  
(410) 243-8800  
(410) 630 7232 (fax)